

21 June 1995

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MEMORANDUM

From: David Porter, SOUTHDIV

To: Lawson Anderson, EnSafe
Tonya Barker/Rob Williamson, NAS Memphis
Chris Bartku, SOUTHDIV
Jack Carmichael, USGS
Jordan English/Jim Morrison, TDEC (Memphis)
Sue Hosmer, NAS Memphis
Keith Johns, EnSafe
Sue Lawley, SOUTHDIV
CDR R. P. Mason/LCDR D. Archambault, NAS Memphis
Mark Taylor, SOUTHDIV
Clinton Willer, TDEC (Nashville)
David Williams, EPA Region IV

Subj: NAS MEMPHIS BRAC CLEANUP TEAM (BCT) MEETING, 7-8 JUN 95

Encl: (1) Minutes from 7-8 June BCT Meeting

1. Enclosure (1) is forwarded for your review and information. In addition to on-going review and recurring requirements, the list below summarizes follow-up assignments from previous BCT and RAB meetings:

EnSafe (Lawson Anderson/Keith Johns/Becka Presley/Mark Bowers):

- Revise poster with RBC/MCL explanation.
- With risk assessor's input, draft information package to be given to RAB members on test results from Assembly A and background sampling.
- With risk assessor's input, develop method and schedule for determining background levels and present to the BCT at the next meeting.
- Distribute new base maps and disks.

NAS Memphis - Environmental (Tonya Barker/Rob Williamson/Danny Chumney/Randy Wilson/Jim Heide):

- Coordinate the disposal of IDW using Federal Prisoner labor.

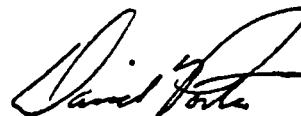
SOUTHDIV (Chris Bartku):

- Coordinate review of the revised Interim Measures Work Plan for SWMUs 66 and 67.

USGS (Jack Carmichael):

- Finalize poster with simplified geology cross section (color and dry mount) for the next RAB meeting.

2. Please call if you have comments and/or questions: (803) 743-0610, DSN 563, e-mail: dlporter@efdsouth.navfac.navy.mil.



NAS MEMPHIS BCT MEETING MINUTES
7-8 JUNE 1995

The NAS Memphis BRAC Cleanup Team was convened at 11:30 am on Wednesday 7 June in the Environmental conference room in building S-241. The following people were in attendance:

Lawson Anderson, EnSafe (Memphis)
Tonya Barker, NAS Memphis
Mark Bowers, EnSafe (Raleigh)
Jack Carmichael, USGS (Nashville)
Jordan English, TDEC (Memphis)
David Porter, SOUTHDIV
Mark Taylor, SOUTHDIV
Clint Willer, TDEC (Nashville)
David Williams, EPA Region IV
Rob Williamson, NAS Memphis

David Porter distributed and discussed a draft Finding of Suitability to Lease (FOSL) for the airfield. He noted that asbestos work remains to be done in building N-2 (Air Traffic Control Tower) and building 774 (Aircraft Wash Rack). This work must be completed prior to the lease. Also, he discussed the proposed policy for the removal of tanks. All underground tanks will be removed, as none meet impending requirements for corrosion protection and spill and overflow prevention. Aboveground tanks will be removed if they do not meet secondary containment requirements (SPCC Plan deficiencies). Oil/water separators will be removed if they have separate underground tanks for oil accumulation which do not meet regulatory requirements. The removal work will not be complete prior to the lease in October. The tanks will be closed and locked, with the understanding from the lessee that the tanks are not available for their use.

The Preliminary Risk Evaluation (PRE) for the lease area, conducted by EnSafe, and incorporating data from a portion of the investigation at SWMU 7, indicates that the hazard sum for carcinogens is slightly higher than $1.0E-04$ for residential groundwater, but is well within guidelines for residential soil and industrial groundwater and soil. For non-carcinogens, the hazard sum is slightly higher than 1.0 for residential groundwater, is slightly less than 1.0 for residential soil, and is well within guidelines for industrial groundwater and soil.

David Williams provided David Porter with a draft document that EPA Region IV will use in reviewing FOSLs.

The meeting was adjourned for lunch at 12:00 noon, and reconvened at 1:30 pm for a meeting with the Millington Base Reuse Committee, Millington Municipal Airport Authority, and their sub-lessee, Millington Aviation Services. The following people attended this meeting.

LCDR Dave Archambault, NAS Memphis
Tonya Barker, NAS Memphis
Cherie Duddridge, Air BP

Jim Ferguson, Millington Base Reuse Committee
Rick Henson, Dees Oil
Eric Hurt, NAS Memphis
LCDR Terry Jones, NAS Memphis
Rodney Lumpkins, TDEC (Memphis)
CDR Rich Payne, NAS Memphis
David Porter, SOUTHDIV
Frank Ryburn, Millington Municipal Airport Authority
Phil Whittenberg, Millington Base Reuse Committee
Clint Willer, TDEC (Nashville)
David Williams, EPA Region IV
Tom Williams, Millington Aviation Services
Rob Williamson, NAS Memphis

The purpose of the meeting was to discuss RCRA liabilities under leases. Clint Willer, and later Rodney Lumpkins, explained that although the property owner is ultimately responsible for actions on their property, the generator of hazardous waste is responsible for following all regulatory requirements and will be held accountable for failure to do so. Rodney Lumpkins noted that the Navy has informed TDEC by letter that it no longer generates hazardous waste at Hangar N-126, and that the Navy has leased the facility to Millington Municipal Aviation Authority. Rodney Lumpkins asked if the activities of Millington Aviation Services have generated any hazardous waste. Tom Williams stated that, to date, they have not. Cherie Dudd noted that the recent downloading of fuel from the tanks did not produce a hazardous waste, but rather the fuel was reclassified as diesel. Rodney Lumpkins noted that although Millington Aviation Services may not be currently generating hazardous waste, it may very well do so in the future. He suggested that the company apply for a hazardous waste generator's permit (EPA ID number). Therefore, if and when the functions conducted by Millington Aviation Authority do begin to generate waste, the ID number will be available for disposal.

This meeting was adjourned at 3:00 pm, and reconvened at 3:30 pm with the following in attendance:

Lawson Anderson, EnSafe (Memphis)
Tonya Barker, NAS Memphis
Mark Bowers, EnSafe (Raleigh)
Jack Carmichael, USGS (Nashville)
Jordan English, TDEC (Memphis)
David Porter, SOUTHDIV
Mark Taylor, SOUTHDIV
Clint Willer, TDEC (Nashville)
David Williams, EPA Region IV
Rob Williamson, NAS Memphis

Lawson Anderson provided the BCT with preliminary analytical data gathered during the DPT investigation at SWMU 40. The results indicate petroleum contamination in the vicinity of the

former service station, including several petroleum constituents (i.e. naphthalene and toluene) detected at the top of the fluvial deposits. This site is listed as a SWMU because of a former salvage yard. Since the contamination appears to be coming from the tanks rather than the SWMU, the BCT decided the tanks can be removed as a UST. Any monitoring wells required would be handled under the tank program. This site will be added to the Tank Closure Plan. There is some question whether or not the tanks remain in place. The geophysical study conducted by EnSafe is inconclusive, and Larry Jones (NAS Memphis Environmental) remembers that one of the tanks collapsed when a bulldozer passed over it during the service station demolition. He was unsure whether or not the tanks had been removed.

David Williams stated that surface samples are needed to conduct a risk analysis. Lawson Anderson and Mark Bowers noted that much of the surface soil in the area is a mixture of soil and asphalt from former paving and would show high semi-volatiles. It was decided to ensure that at least 5 surface samples are taken at all SWMUs and analyzed for metals, semi-volatiles, and pesticides. Any risk analysis conducted for SWMU 40 will taken into account the former asphalt paving.

Next, the preliminary results were reviewed for SWMU 15. The BCT decided to install 4 pairs of wells in the next phase of the investigations: Shallow (upper fluvial) closer into the site, and deeper (lower fluvial) further out. These wells are scheduled to be installed in the Oct/Nov time frame.

At SWMU 21 (former underground waste tank), preliminary results indicate carbon tetrachloride in the fluvial. The BCT decided that 3 lower fluvial and 1 upper fluvial wells are needed for the next phase of the investigation. Also, David Williams noted that a full scan surface sample was needed for risk assessment. He stated that for any SWMU, a couple of full scan analysis samples are needed for surface soil. This data will be used for the risk assessment for transfer of the property. David Williams will talk to the risk assessor at EPA on surface sampling requirements for property turnover.

The BCT discussed the memorandum prepared by EnSafe on the disposal of Investigation Derived Waste (IDW). The memo concludes that IDW generated during the Assembly A investigation is non-hazardous waste based on the hazardous waste regulations and the USEPA Superfund Land Disposal Restrictions Guide #5. The BCT agreed with the determinations as outlined in the memo, and Rodney Lumpkins, TDEC RCRA, saw no problem with the rationale used in arriving at the determination of being non-hazardous. Clint Willer reiterated that the decision of where to disposal the waste is one which the activity makes, but suggested that it is prudent to consider putting it on a SWMU in one location. There is potential risk involved with placing it in residential areas as fill, as all such areas could become SWMUs should any further requirements or concerns develop for the material.

The meeting was adjourned for the day at 5:00. On Thursday morning at 9:00 am, the BCT attended a meeting of the Millington Base Reuse Committee at Millington City Hall. The city's reuse plan contractor, RKG Associates, presented the committee with two options for reuse of the base: (1) airport related, and (2) mixed use without the airport. The committee postponed a

decision for at least 10 days until potential funding sources for the airport's operations could be reevaluated and investigated.

The BCT reconvened at 1:00 pm in the Environmental conference room in building S-241. The following people were in attendance:

Lawson Anderson, EnSafe (Memphis)
Tonya Barker, NAS Memphis
Jack Carmichael, USGS (Nashville)
Jordan English, TDEC (Memphis)
Steve Green, EnSafe (Memphis)
David Porter, SOUTHDIV
Mark Taylor, SOUTHDIV
Clint Willer, TDEC (Nashville)
David Williams, EPA Region IV
Rob Williamson, NAS Memphis

Steve Green provided the BCT with a demonstration of the Environmental Baseline Survey (EBS) database and CD system.

Lawson Anderson asked for a 3 week extension on the Assembly E Work Plan (original due date 23 June, proposed extension to 17 July). Due to the amount of work currently underway, EnSafe feels a better quality product would be produced with the extension. The BCT had no objections to the request.

Lawson Anderson presented an example of a map of SWMU 7 with contamination contours (to be produced for the next RAB). It was noted that contour intervals of 5 pp. would produce a better map, and EnSafe will revise accordingly. The map will be overlaid on an aerial photo. Also, it was suggested that the data for Assembly A be presented in as understandable terms as possible for the RAB, especially when comparing with RBC levels. It was decided to color code the data with green=below residential, yellow=above residential but below industrial, and red=above industrial.

The BCT reviewed the results from the additional DPT work performed at SWMU 7. A PCE hit was identified to the east of Hangar N-126.

The meeting was adjourned at 4:30 pm.